

## **Industrial Pretreatment SOP**

**The following is a guideline to the order forms etc are sent out and processed;**

Since the Pretreatment Audit in July 2009 we have set up the following to assist the Pretreatment Coordinator with finding new businesses that come into the City of Helena. Every week the Building Dept sends a report listing the building permits that were applied for. When reviewing that list you find a new business or a change in a business that you want further clarification on you go to the Building Dept. and pull the set of plans. For example; If there is a auto shop going in you can see if there are water/oil separators etc. This will give you a heads up that you may want to go in and inspect the building after it's completed or at least send screening and/or survey forms to the owners in advance.

On the AS400 you can pull a report for any business licenses that were issued for any given month. This is helpful when a building may be used as a daycare at one time and then without changing ownership it may become a dental office.

The Fire Marshall when he is out doing fire safety inspections keeps a look out for stored chemicals or used oil in a building that I may not be aware of. He sends me a copy of his report or calls and lets me know so that I can do an inspection myself. We have even done inspections at the same time.

The Utility Maintenance Dept will be performing back flow prevention audits in every business in town. They have agreed to leave a screening form with each business. If they see anything out of the ordinary or floor drains located close to chemical or waste oil they will contact the pretreatment coordinator immediately.

It may be as simple as word of mouth or noticing a new business while driving around town. The important part is to keep communications open with all the City depts. for information.

## **Inventory of the existing businesses:**

A “Screening” form is mailed or delivered to a business to be filled out. (see attached form). The form asks that the business return it within 15 days. When you receive the filled in form you will go into the Access program and enter the information. At that time you will determine if you need further information to categorize the business. You are looking for any waste that may be present that would adversely affect the POTW.

- Anything that is addressed in the Prohibited Substances in the Ordinances.
- The discharge must be able to meet the local limits for heavy metals set in the Ordinances.
- A business that discharges 25,000 gallons or more a day of process wastewater is considered to be a significant industrial user.
- If the business is “Categorical” they would require a permit no matter how small of a generator they may be.
- The discharge needs to meet the limits set in the Ordinances for BOD, TSS, Oil/grease, Benzene and BTEX.

If you suspect any of these things or need more information you can send them a “Survey” form. This is more detailed and addresses things like stored chemicals and hauled waste. (See attached form) In lieu of a “Survey” form, or in addition to, you may conduct an inspection of the business.

If the inspection warrants the business to be permitted, then they are required to apply for an “**Industrial User Discharge Permit**”. From the information gathered at the inspection, any sampling that you or the business has had performed, and the information furnished in the application will be used to write a **Statement of Basis** and then the “**Industrial User Permit**”.

A “statement of basis” outlines why you feel a permit is necessary to monitor and/or control the discharge from the business. The statement of basis needs to address sampling frequency and what the limits will be for the parameters you are permitting them for. It should contain all the same information that will be covered in the permit. This helps make your permit more legally defensible. You will need to pull together the inspection report, pictures, sampling data ect., used to justify the permit.

After the “statement of basis” is completed you can start writing the actual “Industrial User Discharge Permit.” The permit should be written for a 5 year period that includes reopener language in case regulations change or the processes performed change. It will contain the same sampling frequency and parameters as you wrote in the “statement of basis”. It will define what kind of sample is to be taken (grab or composite) and designate a set sampling port. Once a business is permitted you have to perform an inspection at least once a year and pull a sample to have analyzed for the permit requirements. The cost of this can be charged to the business but to date the City’s Pretreatment Program has paid for it since there are so few.

The permit is sent out 30 days before it goes into effect to be reviewed by the permittee. Any concerns they have need to be addressed before the effective date of the permit. Once the permit is in effect, it is up to the permittee to maintain compliance.

If the permittee violates the conditions of their permit, the City will revert to the **“Enforcement Response Plan”** to be consistent with the violations depending on the nature.

There are several different types of violations and forms of non-compliance. There is “Reportable Non-Compliance” and “Significant Non-Compliance (SNC). SNC violations must be published in the newspaper a minimum of once a year. Both are reportable on the Annual Pretreatment Report to EPA. Refer to 403.8

## **HAULED WASTE SOP**

The septic station has two motion activated cameras. One is directed at the hatch and the other towards the driver when getting in and out of the vehicle. These events are recorded in the office. When the hatch is opened using a key code, the time and date and the user is recorded on the computer inside the Admin bldg. The cameras are motion activated so that when the truck pulls in the visual is shown and recorded on the monitor inside the Admin bldg. There is an automatic sampler in the enclosure in the septic station. It takes a timed proportional sample as they dump. Randomly we go out and sample directly from the trucks as they pump and run nutrient and/or metals.

To set up a new hauler they must first gain a license to haul septic waste from the State of Montana. Billing information is gathered and an access code is set up for them to use the septic station.

Give them ***“Manifest Forms”*** and instruct them that one has to accompany each load they bring in. The manifest form shows where the septic was generated from and the time and date the hauler pumped it. There is a signature requirement on the bottom of the form and a place for the time and date the septic is discharged to the City WWTF. There is a receptacle for the manifest forms at the septic station.

Throughout the month the manifest forms are collected and entered into an Excel file for each hauler. At the beginning of each month an invoice is generated from the spreadsheet that lists the dates and amounts of each manifest form for each hauler. As of October 2010 hauled waste fees are \$ 47.40 per 1,000 gallons.

Checks received for payment are listed on a **“Deposit”** form. The deposit form, checks and copy of each invoice being paid is sent to the Finance Office to be receipted in. Mark the payment off on the copy of their bill in our file and post it to the monthly summary. The monthly revenue is tracked on the monthly billing form.

Past due amounts are handled on a case by case basis. Usually if a past due amount exists a notice is placed on their invoice asking for the account to be made current by a certain date. If they get 2 months behind the notice on the invoice will give them a date to pay the account or be denied access to the septic station. If that occurs, deactivate the haulers key code in the computer so that they can not access the septic station.

After payment has been received a decision to allow them full access to the septic station will need to be made by the pretreatment coordinator and/or the Superintendent.

If payment is not received at all the account needs to be turned over to the City Attorney's office for collection.

File the manifest forms in the filing cabinet located in the garage for future reference. The beginning of every year, box up the past year in a storage box and take it to the basement. These records can be purged after three years.